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VIA ELECTRONIC CASE FILING

New York, New York 10007-1312 500 Pearl Street, Room 2240 Daniel Patrick Moynihan United States Courthouse Southern District of New York United State District Court Honorable Michael B. Mukasey

Our File No.: 871 EM167 Case No.: 05 CV 5518 (MBM) Salem v. Lansdell Protective Agency, Inc. Re:

Dear Chief Judge Mukasey:

September 18 discovery deadline. September 18, 2006. We write for the purpose of requesting an extension of the ordered by Your Honor on July 17, 2006, all discovery shall be completed by above-referenced action. As set forth in the Proposed Revised Scheduling Order so This firm represents Defendant Lansdell Protective Agency, Inc. in the

extension of the discovery deadline to October 31, 2006. discovery by the September 18 deadline. We, therefore, respectfully request an However, due to scheduling conflicts, the parties will be unable to complete related to this matter from the EEOC and are promptly scheduling depositions. The parties have only recently received copies of the requested materials

requested extension, enclosed is a Second Proposed Revised Scheduling Order. being made on consent of Plaintiff's counsel. Subject to the Court's approval of the This is the second request for an extension of the discovery deadline and is

We thank the Court for its consideration of this matter.

Respectfully submitted,

LVKLEK KKINSKK & DKOCIN ITL

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Alexander A. Reinert, Esq. (via Electronic Case Filing) Mr. Lansdell McRoberts (via first class mail) Enclosure

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o ² CA ²² 18 (MBM)	:	KHALED SALEM, Plaintiff,
	X	SOUTHERN DISTRICT OF NEW YORK UNITED STATES DISTRICT COURT

Pursuant to defendant LANSDELL PROTECTIVE AGENCY, INC.'s request, by and through its attorneys, Tarter Krinsky & Drogin LLP, and on consent of plaintiff KHALED SALEM's attorneys Koob & Magoolaghan, it is hereby Ordered that the Proposed Revised Scheduling Order entered in the instant case be revised as follows:

1. All discovery shall be completed by October 31, 2006.

SO OKDEKED.

Dated: New York, New York ..., 2006

THE HON. MICHAEL B. MUKASEY Chief Judge, United States District Court